

1           A     No.

2           Q     All right. You had no beef against West,  
3 did you?

4           A     No.

5           Q     And you knew of no beef that he had against  
6 you; right?

7           A     Not that I know of.

8           Q     So do you know that Mr. West took a  
9 polygraph in connection with a VSP, Virginia State  
10 Police investigation and passed the --

11          A     In jail?

12          Q     And passed the polygraph, did you know  
13 that?

14                   MR. BELL: Object to the form.

15                   MS. WALLACE: Form.

16 BY MR. KRUDYS:

17          Q     Go ahead.

18          A     Yes, I know he took one.

19          Q     And did you know that he passed the  
20 polygraph?

21          A     I --

22                   MR. BELL: Object to the form. Go ahead.

23                   MS. WALLACE: Form.

24                   THE WITNESS: I was told that he passed,  
25 yes.

1 more years and then retire?

2 A I don't know if I'd say that was my plan.  
3 I discussed that with my wife. But I'd never made an  
4 actual plan or decided what I was going to do.

5 Q What exactly was going on that was so  
6 pressure packed for you that you decided to quit two  
7 weeks short of retirement?

8 MR. BELL: Object to the form. Go ahead.

9 THE WITNESS: Honestly, my thinking was if  
10 I could be lied on one time and have to go  
11 through this much trouble, then it would be  
12 easier for an inmate to lie on me again. And I  
13 mentally and emotionally couldn't take this  
14 again.

15 BY MR. KRUDYS:

16 Q Did you receive any type of mental health  
17 care? Like did you see a doctor or a therapist for  
18 what went on?

19 A Yes.

20 Q What -- who did you see? Was it a  
21 psychiatrist, was it a psychologist, a regular MD or  
22 DO?

23 A Just a regular MD, I guess.

24 Q Okay. Are you on any medication this  
25 morning?

1 ground. I was on a cell entry one time. I was  
2 holding the shield. So I was the first man in, and  
3 when we went in, we took the inmate to the ground.

4 Q All right. But was there any type of  
5 videotape of that entrance?

6 A I assume that there was. But I couldn't  
7 tell you what the date was or anything like that. I  
8 don't even remember who the inmate was.

9 Q Was there like a body camera video that was  
10 utilized in that circumstance?

11 A No. Generally there's a -- somebody  
12 standing with a handheld camera videotaping.

13 Q Okay. But you knew that when Mr. Givens  
14 was in the shower, there was going to be no cameras  
15 in the shower; right?

16 A Well, I knew that there was no cameras  
17 placed in the shower, yes.

18 Q Yeah. Had you ever seen Officer Creager  
19 hit or go hands on with an inmate?

20 MS. WALLACE: Form.

21 THE WITNESS: I recall an incident where he  
22 done a cell entry on the inmate.

23 BY MR. KRUDYS:

24 Q Getting back to Mr. Givens, other witnesses  
25 have testified to him having like a -- being like a